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May 27, 2010

**BY EMAIL & U.S. MAIL**

Leonard A. Bennett, Esq.  
Robin A. Abbott, Esq.  
Consumer Litigation Associates PC  
12515 Warwick Boulevard  
Suite 100  
Newport News, Virginia 23606

Matthew J. Erausquin  
Consumer Litigation Associates, P.C.  
1800 Diagonal Rd, Suite 600  
Alexandria, VA 22314

*Re:     *Donna K. Soutter, et al. v. Equifax Information Services, LLC*  
Case No. 3:10cv107*

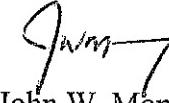
Dear Len, Robin & Matt:

Please find enclosed Defendant Equifax Information Services, LLC's Rule 26(a)(1) Initial Disclosures Concerning Claims of Plaintiff Donna K. Soutter regarding the referenced matter.

Please contact me should you need additional information or have any questions regarding the same.

With kind regards, I remain

Very Truly Yours,



John W. Montgomery, Jr.

JWM/clt  
Enclosures  
Cc:     Equifax Information Services, LLC

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

DONNA K. SOUTTER, )  
*For herself and on behalf of all* )  
*similarly situated individuals* )  
Plaintiff, )  
v. ) Civil Action No. 3:10-cv-00107 (REP)  
EQUIFAX INFORMATION )  
SERVICES LLC, )  
Defendant. )

**DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S  
RULE 26(a)(1) INITIAL DISCLOSURES CONCERNING  
CLAIMS OF PLAINTIFF DONNA K. SOUTTER**

Defendant, Equifax Information Services LLC ("Equifax"), by its undersigned counsel, makes the following initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) in relation to the claims of Plaintiff Donna K. Soutter<sup>1</sup>:

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

(i) Plaintiff Donna K. Soutter

c/o Leonard A. Bennett  
Matthew J. Erausquin  
Consumer Litigation Associates  
12515 Warwick Boulevard, Suite 100  
Newport News, VA 23606

Plaintiff is likely to have knowledge of her personal and credit history and the facts alleged in her Complaint.

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<sup>1</sup> Equifax has made separate initial disclosures in relation to the claims of Plaintiff Tony Webb.

- (ii) Representatives of Equifax Information Services LLC  
Equifax Information Services LLC  
1550 Peachtree Street, N.E.  
Atlanta, Georgia 30309

Equifax will designate a representative likely to have knowledge regarding any communications between Plaintiff and Equifax; the policies, practices and procedures of Equifax for handling consumer disputes and consumer credit files; and, after reviewing relevant documents, the contents of Plaintiff's credit file and Equifax's handling of any disputes made by Plaintiff.

Equifax will also designate a second representative likely to have knowledge of Equifax's relationship with LexisNexis and Equifax's policies and procedures for collecting and reporting public record information, including public record information from the Richmond General District Court.

- (iii) Representative(s) of LexisNexis  
Marquis One Tower  
Suite 1900  
245 Peachtree Center Avenue  
Atlanta, Georgia 30303

This representative(s) is likely to have information concerning LexisNexis's policies and procedures for collecting and reporting public record information, including public record information from the Richmond General District Court.

- (iv) Representative(s) of Virginia Credit Union  
Address Unknown

This representative(s) is likely to have information concerning Plaintiff's relationship with Virginia Credit Union and the judgment entered against Plaintiff in favor of the credit union.

**(B) a copy or a description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

Equifax has identified the following documents in its possession that are relevant to the facts alleged with particularity in the Complaint:

- (i) ACIS cases reflecting disputes made by Plaintiff;
- (ii) ACDVs related to Plaintiff's disputes;
- (iii) Correspondence from Plaintiff to Equifax;
- (iv) Relevant policy and procedure manuals;
- (v) Equifax's agreement with LexisNexis.

**(C) A computation of any category of damages claimed by the disclosing party, making available e for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Equifax is not seeking damages at this time but reserves the right to seek reimbursement of its attorney's fees and costs in this matter.

**(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

At this time, based upon the allegations in the complaint, Equifax is self-insured for this matter.

Respectfully submitted this 27th day of May, 2010.

*JWM*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, a copy of the foregoing **DEFENDANT EQUIFAX INFORMATION SERVICES LLC'S INITIAL DISCLOSURES CONCERNING CLAIMS OF PLAINTIFF DONNA K. SOUTTER** was served by regular US Mail, postage pre-paid, to the following:

Leonard A. Bennett, Esq.  
Matthew J. Erausquin, Esq.  
Robin A. Abbott, Esq.  
Consumer Litigation Associates PC  
12515 Warwick Boulevard  
Suite 100  
Newport News, Virginia 23606

Dated: May 27, 2010

*J.W.*  
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Counsel for Defendant Equifax Information Services LLC